

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ROCK ERICKSON,
MICHAEL BONGERS

PLAINTIFFS,

CASE NO: 1:17CV00592

v.

HOME DEPOT U.S.A., INC.,
CIGNA HEALTH AND LIFE INSURANCE COMPANY,
XYZ INSURANCE COMPANY,
Defendants.

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Plaintiffs, Rock Erickson and Michael Bongers, submit their initial disclosures to comply with FRCP 26(a)(1). The Plaintiffs maintain their right to supplement these disclosures in the future.

I(a)(1)(A)(i) Individuals

1. Rock Erickson
 - a. W5866 Royaltroon Drive
 - b. Mr. Erickson is the injured party. He will testify to the specific facts regarding the injury and his damages.
2. Michael Bongers
 - a. W5866 Royaltroon Drive; 608-243-1676
 - b. Mr. Bongers is Mr. Erickson's spouse. He will testify to damages.
3. Dr. Keyvan Ghrabeighlou
 - a. Theda Care Radiology
 - b. 1818 N. Meade Street, Appleton, Wisconsin
 - c. Reviewed MRI of Rock Erickson's head.
4. Dr. Thomas Mattio
 - a. Neuroscience Group
 - b. 1305 West American Drive, Neenah, Wisconsin
 - c. Diagnosed Mr. Erickson with post-concussive syndrome (310.2), central cord syndrome (952.08), neck pain (723.1) and numbness (782.0)

5. Dr. Julie Bobholz, PhD
 - a. Bay Care Clinic- Green Bay East Medical Center
 - b. 2845 Greenbrier Road, Green Bay, Wisconsin
 - c. Performed a neuropsychological evaluation on Mr. Erickson
6. Dr. Scott Schinschke
 - a. Osteopathic Medicine and Physical Therapy Group
 - b. 1010 S. Oneida Street, Appleton, Wisconsin
 - c. Diagnosed Mr. Erickson with elbow tendonitis (727.09), post-concussion headache (339.2), post-concussive syndrome (310.2) and nausea (787.02).
7. Dr. Kelley Parnell
 - a. St. Elizabeth Hospital
 - b. 1506 S. Oneida Street, Appleton, Wisconsin
 - c. Conducted a sleep study as a result of Mr. Erickson's diagnosis of cognitive impairment with daytime hyper-somnolence.
8. There may be further medical providers based on medical records we have yet to receive.

II(a)(1)(A)(ii) Documents Possessed

1. Neuroscience Group Medical– Attached
2. Bay Care Clinic Medical Record – Attached
3. Osteopathic Medicine and Physical Therapy Group Medical Record – Attached
4. St. Elizabeth's Hospital Medical Record – Attached

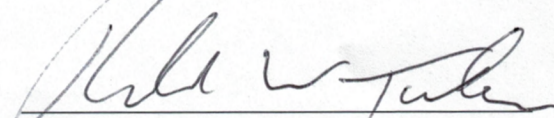
III(a)(1)(A)(iii) Damages Computation

1. I have not yet received all billing statements. There is no way I can value the case until I have this information. I will provide a formal demand letter as soon as we are able.

Dated at Appleton, Wisconsin, this 4 day of Aug, 2017.

TUSLER LAW, LLC

BY:



Ronald W. Tusler, Attorney for the Plaintiff
State Bar No. 1066815

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